

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of:)

(Amendment of Part 97 of the Commission's) RM-11625

Rules to Facilitate Use in the Amateur Radio)

Service of Single Slot Time Division Multiple)

Access (TDMA) Telephony and Data Emissions)

To the Commission:

I support the Petition For Rulemaking filed by the ARRL to facilitate the use of single-slot TDMA under Part 97 of the Commission's rules. I urge the Commission to move quickly to adopt this proposal for the following reasons:

The proposed change removes a long standing ambiguity in Part 97 concerning the use of single slot TDMA technology in the Amateur Radio Service.

Amateur Radio itself suffers from tremendous spectrum crowding issues as do Part 90 users. In the Amateur Service 2 meter and 70 cm bands this problem is very pronounced around the United States. Amateur Service Frequency Coordinators in many areas have adopted policies to encourage the use of spectrum efficient digital repeaters and the user community has responded by deploying D-STAR, P25, DMR and similar technologies and this is a great tool to accommodate this.

The proposed changes enable and encourage the adoption of spectrally-efficient narrowband technology.

The proposed changes also allow flexible use of new commercial off the-shelf technology within the Amateur Radio Service.

Implementation of digital TDMA technology has been successful in the Land Mobile Radio Service, and easily co-exists with adjacent analog operation without interference.

This change has little or no risk of producing any negative effect on the Amateur Radio Service and by the nature of the request do far more good. The proposed rulemaking is in the public interest and will allow the amateur radio service to continue experimentation and implementation of state of the art communication technologies, as well as enable additional avenues of emergency communications during times of crisis.

Respectfully submitted,

David Markham, W0CBI